Plaintiff's Notice of Motion and Motion for Default Judgment by Court - 1

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Case 2:25-cv-00321-AH-AGR

At the time and place of hearing, Plaintiff will present proof of the following matters: (1) Defendants ELITEVANITY LLC and 800 S. SAN FERNANDO BLVD., LLC are not minors, incompetent persons, or in military service or otherwise exempted under the Soldier and Sailor's Civil Relief Act of 1940; (2) Defendants ELITEVANITY LLC and 800 S. SAN FERNANDO BLVD., LLC have not appeared in this action; and (3) Plaintiff is entitled to judgment against said Defendant on account of the claims pleaded in the complaint, to wit: a violation of the Americans with Disabilities Act.

The Plaintiff seeks a judgment in the amount of \$3,185.00 in attorney fees and costs as set forth in the attached declaration of Jason J. Kim and an Order directing the Defendants to: make alterations in such a manner that, to the maximum extent feasible, the goods, services, facilities, privileges, advantages, or accommodations offered by Defendants are readily accessible to and usable by individuals with disabilities at the property located at or about 800 S. San Fernando Blvd., Burbank, California. This motion is based on this notice, the declarations submitted in support of this motion, and other matters which may be presented at the hearing.

Notice of the original motion for default judgment by court was served on Defendants ELITEVANITY LLC and 800 S. SAN FERNANDO BLVD., LLC on May 30, 2025 by first class United States Mail, postage prepaid.

Dated: May 30, 2025 SO. CAL. EQUAL ACCESS GROUP

By: <u>/s/ Jason J. Kim</u>
Jason J. Kim, Esq.
Attorneys for Plaintiff